

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	NO. 1:23-cr-10186-ADB
v.)	
)	
)	
JOAN AVALO-QUEZADA)	

Defendant Joan Avalo-Quezada's Proposed Conditions Of Release

Now comes the defendant Joan Avalo-Quezada, before this Honorable Court, and respectfully moves this Court to release him on the pre-trial conditions proposed below. As reasons and grounds therefore, Mr. Avalo-Quezada states he does not pose a risk of flight or danger to the community such that upon consideration of the factors set forth in 18 U.S.C. § 3142, he is an appropriate candidate for release.

Mr. Avalo-Quezada is charged in count 5 of the indictment with violating 18 U.S.C. § 1962(d), alleging Conspiracy Conduct Enterprise Affairs Through a Pattern of Racketeering Activity, and also with Conspiracy to Distribute Controlled Substances in violation of 21 U.S.C. § 846 in matter No. 24-mj-1056-DLC.

Mr. Avalo-Quezada is 27 years old and a lifelong resident of Boston, Massachusetts. Prior to his arrest he lived in Charlestown for the past three years with his romantic partner and his three children Ava (2), Nova (2), and Joan Jr. (7). He had previously resided in his familial home with his mother Joselin Quezada and siblings in Hyde Park where the family had lived since 2014. He attended public schools in Boston, and graduated from South Boston Excel in 2017.

Mr. Avalo-Quezada has no prior criminal convictions. He has a number of adult criminal entries, but all adult matters have been dismissed or for which he was acquitted, save a 2022 case out of the Stoughton District Court charging Possession with Intent to Distribute Class D for which he received a continued without a finding. Mr. Avalo-Quezada does have a number of delinquency adjudications on his record for which he received DYS commitments in 2011 and 2013.

Mr. Avalo was placed on disability as a juvenile for a number of mental health conditions including depression, anxiety, PTSD, and Bipolar disorder. As a young adult Mr. Avalo-Quezada initially did not work and accepted the disability payments, however, by 2022, he felt that he needed to start working and providing meaningfully for his children. In late 2022, he ceased using his medications and began working in capacity as a temporary worker through Resource Options Inc. based out of Needham. He largely worked in construction, and had been working an assignment in New Hampshire for a few months consistently that was supposed to become a permanent position had Mr. Avalo-Quezada not been arrested.

Mr. Avalo-Quezada seeks an opportunity for release on conditions. He recognizes the seriousness of the allegations, and that he must have a strict release plan to provide this Court with assurances that he can live as a productive member of the community. He is seeking release on home confinement to his sister Daviana's residence in Franklin, where he would reside with his sister, her partner, and Mr. Avalo-Quezada's son. He seeks permission to leave the residence only for medical treatment, legal visits, necessary school meetings involving his son, and for verified employment. His sister, writes this Court and has expressed that the family understands the seriousness of the charges Mr. Avalo-Quezada is facing, and his family is committed to

providing him with a supportive living environment and with helping him to get “back on track” (See Exhibit Letter Avalo).

Mr. Avalo-Quezada submits that he is an appropriate candidate for release on conditions pursuant to 18 U.S.C. § 3142, and he proposes the following conditions:

1. He be required to reside at his sister’s residence in Franklin, the address of which has been reported to probation.
2. That he be subject to home confinement until he is employed. Once employed, the Probation Department should be authorized to set a reasonable curfew that accommodates his work schedule. The Probation Department should also be authorized to allow Mr. Avalo-Quezada to leave the home to seek employment, attend medical appointments, to attend necessary school meetings for his son, and to meet with his attorney.
3. That he be fitted with a G.P.S. bracelet.
4. That he participate in mental health treatment.
5. That he not have contact with his co-defendants.
6. That he be prohibited from traveling outside of Massachusetts.
7. That he abide by all local, state and federal laws.

Respectfully Submitted,
Counsel for the defendant,

/s/ Jason Benzaken

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Dated: September 4, 2024

Certificate of Service

I hereby certify that a copy of this motion has been served upon the parties to this matter and counsel for the United States through CM/ECF.

/s/ Jason Benzaken

Dated: September 5, 2024